

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

DOCKET NO: 05-CR-10220-NMG

\_\_\_\_\_  
UNITED STATES OF AMERICA )  
v. )  
JAMES GOODWYN )  
\_\_\_\_\_ )

MOTION FOR A PRE-PLEA PROBATION INVESTIGATION AND REPORT

The Defendant, James Goodwyn, through counsel, moves this court, pursuant to 18 U.S.C. §3552(a), to order a United States probation officer to make a pre-sentence investigation and report of the Defendant prior to his Rule 11 plea hearing of June 29, 2006.

As reasons therefore, counsel asserts the following:

1. This procedure will assist all parties in reaching a prompt and fair resolution of the matter.

By his Attorney,

/s/Joseph F. Krowski, Jr., Esquire  
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Dated: March 29, 2006

